

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:24-cv-00221**

CRAIG CUNNINGHAM,

Plaintiff,

v.

**WALLACE & GRAHAM, P.C.,
MONA LISA WALLACE,
BILL GRAHAM, WHITNEY
WALLACE WILLIAMS, MARK
P. DOBY, RHINE LAW FIRM, P.C.,
JOEL R. RHINE, and SOKOLOVE
LAW, LLC,**

Defendants.

**DEFENDANT SOKOLOVE LAW, LLC'S
FIRST REQUESTS FOR ADMISSION TO PLAINTIFF**

Defendant Sokolove Law, LLC (“Sokolove Law”) by counsel, pursuant to Rule 36 of the Federal Rules of Civil Procedure, propounds the following Requests for Admission (“Requests”) to Plaintiff Craig Cunningham (“Plaintiff”). Plaintiff is requested to respond to each of the Requests set forth below within thirty (30) days of the date of service and thereafter supplement such responses as and when required by all applicable rules.

DEFINITIONS AND INSTRUCTIONS

Sokolove Law hereby incorporates the Definitions and Instructions contained in its First Set of Interrogatories to Plaintiff, served contemporaneously herewith, as if set forth fully herein.

REQUESTS FOR ADMISSION

1. Admit that you have resided in Texas for the past five years.

RESPONSE:

2. Admit that you have not resided in North Carolina for any amount of time in the past five years.

RESPONSE:

3. Admit that in the calendar year 2023, you had more than 10 cellular telephone numbers assigned to you.

RESPONSE:

4. Admit that you are the primary user of the cellular telephone number 615-348-1977.

RESPONSE:

5. Admit that the primary purpose of your use of cellular telephone number 615-348-1977 was to receive calls that you allege were violations of the law.

RESPONSE:

6. Admit that cellular telephone number 615-348-1977 was a business phone line.

RESPONSE:

7. Admit that cellular telephone number 615-348-1977 was not a personal phone line.

RESPONSE:

8. Admit that you never received a phone call, while physically present in the state of North Carolina, from the telephone number 786-758-3380.

RESPONSE:

9. Admit that you never received a phone call, while physically present in the state of North Carolina, from the telephone number 310-579-4443.

RESPONSE:

10. Admit that you never received a phone call, while physically present in the state of North Carolina, from the telephone number 866-444-9876.

RESPONSE:

11. Admit that you never received a phone call, while physically present in the state of North Carolina, from the telephone number 855-643-4133.

RESPONSE:

12. Admit that you have no evidence demonstrating that you received a call from anyone connected with Sokolove Law named “Sean Martin.”

RESPONSE:

13. Admit that you have no evidence of any email from “Sean Martin.”

RESPONSE:

14. Admit that you have no evidence of any telephone call from Sokolove Law using 786-758-3380.

RESPONSE:

15. Admit that you have no evidence of any telephone call from Sokolove Law using 310-579-4443.

RESPONSE:

16. Admit that you have no evidence of any telephone call from Sokolove Law using 310-579-4443.

RESPONSE:

17. Admit that you did not request the do-not-call policy from Sokolove Law at the time you received the telephone calls alleged in your Complaint.

RESPONSE:

18. Admit that you did not request to be placed on Sokolove Law's do-not-call list.

RESPONSE:

19. Admit that you have no evidence that Sokolove Law generated your telephone number through random or sequential number generation.

RESPONSE:

20. Admit that you have no evidence that Sokolove Law called you 47 times using an automatic telephone dialing system.

RESPONSE:

21. Admit that you have no documents to support your claim that Sokolove Law violated the TCPA.

RESPONSE:

22. Admit that you have no documents to support your claim that Sokolove Law violated the North Carolina Telephone Solicitation Act ("NCTSA").

RESPONSE:

23. Admit that you have no evidence that you were ever in North Carolina when you allegedly received any telephone call from Sokolove Law.

RESPONSE:

24. Admit that you have no documents to support your claim for damages under the TCPA.

RESPONSE:

25. Admit that you have no documents to support your claim for damages under the NCTSA.

RESPONSE:

Dated: January 31, 2025

SOKOLOVE LAW, LLC

BY: /s/Virginia Bell Flynn
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Counsel for Sokolove Law, LLC

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2025, a copy of the foregoing document was served on all counsel of record via e-mail.

/s/Virginia Bell Flynn